

REMARKS

Claims 19-33 are pending in the application with claims 19, 22, 25, 28 and 31 being independent. Claims 19, 22, 25, 28 and 31 have been amended. No new matter has been introduced.

Claims 19-33 have been rejected under section 112, second paragraph, as being indefinite. Applicant requests reconsideration and withdrawal of this rejection in view of the amendment of the independent claims to recite "forming a second electrode on the low molecular weight film."

Claims 19-33 also have been rejected under section 112, first paragraph, for an alleged failure of the specification to comply with the written description requirement. In particular, the Examiner alleges that the specification does not provide support for the second, third and fourth insulating layers.

With respect to claims 19 and 22, which recite a second insulating film but do not recite third and fourth insulating films, applicant asks that the Examiner consider page 3, paragraphs [0050] and [0052] of the published application, which provide support for the second insulating film. Paragraph [0050] recites "the resin film 36 is provided to cover a periphery of the anode 35. Paragraph [0052], recites "As the insulating film for covering the periphery of the anode 35, an inorganic film such as a silicon nitride film, a silicon oxide film or other appropriate inorganic films can also be used in place of the resin film". Thus, these paragraphs establish that the resin film that covers the periphery of the anode 35, which corresponds to the recited second insulating film, is an insulating film and may be replaced with an inorganic insulating film. Accordingly, the rejection of claims 19 and 22, and their dependent claims, should be withdrawn.

Claims 25 and 28 have been amended to change the recitation of "a third insulating film" to instead recite "a diamond-like carbon film," as set forth in paragraph [0062], lines 1-3 of the published application. Accordingly, and in view of the discussion above with respect to the second insulating film, the rejection of claims 25 and 28, and their dependent claims, should be withdrawn.

Claim 31 has been amended to remove the reference to "insulating" and to recite that the second and fourth films are diamond-like carbon films. Support for the second film being a diamond-like carbon film is set forth in the published application at the last two lines of paragraph [0066], and support for the fourth film being a diamond-like carbon film is set forth in the published application at the first three lines of paragraph [0062]. Accordingly, the rejection of claim 31 and its dependent claims should be withdrawn.

Claims 19-33 also have been rejected under section 103 as being unpatentable over Yamazaki (U.S. Patent No. 6,274,887).

With respect to claim 19 and its dependent claims, applicant requests reconsideration and withdrawal of this rejection because Yamazaki does not describe or suggest performing a first plasma treatment on the first insulating film after forming the first insulating film, and performing a second plasma treatment at least on the second insulating film after forming the second insulating film, as recited in amended claim 19. The rejection acknowledges that Yamazaki does not explicitly teach that a plasma treatment is performed on the first and second insulating films, but alleges that Yamazaki teaches that silicon oxide is a suitable insulating layer (col. 29, lines 12-36) and that silicon oxide can be deposited via plasma CVD, which would necessarily subject the insulating layers to plasma. However, depositing an insulating layer using plasma CVD (i.e., forming the insulating film using plasma CVD) would not constitute performing plasma treatment on the insulating film after the insulating film is formed. Accordingly, for at least this reason, the rejection of claim 19 and its dependent claims should be withdrawn.

Similarly to claim 19, independent claim 22 recites performing a first plasma treatment on a first insulating film after forming the first insulating film, and performing a second plasma treatment at least on a second insulating film after forming the second insulating film, and independent claims 25 and 28 recite performing a first plasma treatment on a first insulating film after forming the first insulating film. Accordingly, the rejection of these claims and their dependent claims should be withdrawn for the reasons discussed above.

With respect to claim 31 and its dependent claims, applicant requests reconsideration and withdrawal of this rejection because Yamazaki does not describe or suggest an arrangement in which the second and fourth films are diamond-like carbon films. Indeed, Yamazaki does not appear even to disclose a diamond-like carbon film at any point in the specification.

Accordingly, the rejection of claim 31 and its dependent claims should be withdrawn

Applicant submits that all claims are in condition for allowance.

The \$120 fee for the one-month extension of time is being paid concurrently herewith on the Electronic Filing System (EFS) by way of Deposit Account authorization. Please apply any other charges or credits to Deposit Account No. 06 1050.

Respectfully submitted,

Date: 2/27/07

Customer No. 26171
Fish & Richardson P.C.
1425 K Street, N.W. - 11th Floor
Washington, DC 20005-3500
Telephone: (202) 783-5070
Facsimile: (202) 783-2331
/adl
40399218.doc


John F. Hayden
Reg. No. 37,640